

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	:	
Melissa M. Caldwell	:	Chapter 13
Debtor	:	
	:	Case No. 1:19-02462
U.S. Bank National Association	:	
Movant	:	
	:	Answer to
v.	:	Motion for Relief from Stay
	:	
Melissa M. Caldwell	:	
	:	
Respondent	:	

RESPONDENT'S REPLY TO MOTION FOR
RELIEF FROM AUTOMATIC STAY OF SECURED CREDITOR

AND NOW, this 4th day of November, 2019, comes the respondent, Melissa M. Caldwell, by and through counsel, the CGA Law Firm and E. Haley Rohrbaugh, Esquire, and does file the within response averring that:

1. Admitted.
2. Denied. This Paragraph contains a legal conclusion of law to which no response of pleading is required.
3. Admitted.
4. Denied. The exhibit speak for itself.
5. Denied. This Paragraph contains a legal conclusion for which no response is required.
6. Admitted.
7. Denied. The Debtor is currently applying for a Loan Modification to cure the mortgage arrears.
8. Denied. For the reasons stated above.

9. Denied. The Debtor is unaware of the current unpaid balance on the loan.
10. Denied. The movant is not entitled to relief from the automatic stay pursuant to 11 U.S.C. § 362(d).
11. Denied.

WHEREFORE, it is requested that the relief sought not be granted.

Respectfully submitted,
CGA Law Firm

/s/ E. Haley Rohrbaugh
E. Haley Rohrbaugh, Esquire
Sup. Ct. I.D. No. 323803
135 North George Street
York, PA 17401
(717) 848-4900
Counsel for the Debtor

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	:	

CERTIFICATE OF SERVICE

I hereby certify that on November 4, 2019, service upon all interested parties indicated below was made by sending a true and correct copy of the Answer to Motion for Relief, by ECF and/or regular US Mail, postage prepaid, upon:

Charles J. DeHart, III, Esquire
Chapter 13 Trustee
ECF

James C. Warmbrodt, Esquire
701 Market Street, Suite 5000
Philadelphia, PA 19106

/s/ E. Haley Rohrbaugh
E. Haley Rohrbaugh, Esquire